

REMARKS/ARGUMENTS

Claims 1-33 are presently active in this case, Claims 1, 16 and 31 amended by way of the present amendment.

In the outstanding Official Action, Claims 1-5, 9-20 and 24-33 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent 6,546,419 to Humpleman et al. in view of U.S. Patent 6,496,859 to Roy et al., and Claims 6-8 and 21-23 were rejected under 35 U.S.C. §103(a) as being unpatentable over Humpleman et al. in view of Roy et al., and further in view of U.S. Patent Publication 20020090966A1 to Hansen et al.

First, Applicant wishes to thank Examiner Gereziher and Primary Examiner Thompson for the April 13, 2005 personal interview at which time the outstanding issues in this case were discussed. During the interview, Applicant presented amendments and arguments substantially as indicated in this response. While no agreement was reached, the Examiners indicated that the amendments and arguments presented may overcome the outstanding rejection when formally filed, but further search and consideration would be needed.

Turning now to the merits, Applicant's invention is directed to a method and system for simple control of electronic devices on a home network. As discussed in the Background section of Applicant's specification, electronic home devices typically have complex remote controls, as well as unique and complicated menu interfaces, which makes it difficult to access and control all network devices from a simple control device. Applicant's invention addresses this problem by providing a simple hand held device that wirelessly controls electronic devices in a home network. Specifically, Applicant's Claim 1, as amended, recites a method for remotely controlling wireless network devices. The method includes broadcasting a wireless menu request from a hand held control device to electronic devices connected to a wireless local area network (LAN), and receiving a wireless menu response

from one of the electronic devices, the wireless menu response including an identifier and a menu location associated with the one of the electronic devices. Also recited is that representation of one of the electronic devices is displayed on the hand held control device, and that one of the electronic devices is selected based on the user input to the hand held device. The hand held control device establishes a control connection with the selected electronic device via the wireless LAN.

Thus, in order to expedite issuance of a patent in this case, Applicant's Claim 1 has been amended to clarify that the claimed invention includes (1) a hand held control device that wirelessly controls an electronic device on a wireless home network (2) the wireless menu response includes an identifier and a menu location associated with one of the electronic devices, and (3) a display of the hand held control device displays a representation of the electronic device that sent the menu response. Claims 16 and 31 have been amended to include similar limitations in apparatus and means-plus-function format respectively.

The cited reference to Humpleman et al. discloses a method and system for performing a service on a home network having a plurality of home devices connected to the network. As seen in Figure 3 and described at column 4, lines 41-53, the network of Humpleman et al. is a hard wired network and not a wireless network. Thus, although Figure 3 of Humpleman et al. shows a PDA connected to the home network, the PDA is hard wired to the network and cannot wirelessly control an electronic device on a wireless network. Moreover, as acknowledged by the outstanding Official Action, Humpleman et al. does not disclose broadcasting a wireless menu request from the control device to the electronic devices and receiving a wireless menu response from the electronic devices connected to the wireless LAN.¹ Because Humpleman et al. does not disclose a wireless request and menu response, Humpleman et al. also does not disclose that a menu response includes an

¹ See outstanding Official Action at page 6, lines 1-4.

identification and menu location associated with one of the electronic devices on the electronic network, or that such one of the electronic devices is displayed on the hand held device as now recited in Applicant's independent Claims 1, 16 and 31.

Roy et al. discloses a management station that responds to an http request for device discovery. As seen in Figure 5A, the network of Roy et al. is a conventional hard wired network including a personal computer and peripheral devices such as printers 12-14. Thus, Roy et al. does not disclose a hand held device connected to a wireless network as required by Claims 1, 16 and 31. According to Roy et al., an http request is sent to a network device such as a printer with a known location, and the network device discovers other devices with unknown network locations. While responses received from the broadcast indicate a location of the previously unknown network devices, as discussed in the April 13th interview these responses do not include a menu location for accessing a menu for controlling the electronic device as also required by the amended claims.

Thus, neither Humpleman et al. nor Roy et al. disclose a wireless network as required by Claims 1, 16 and 31. As discussed in the April 13th interview, this wireless feature that allows simple control of a home network of dispersed electronic devices. Moreover, neither Humpleman et al. nor Roy et al. disclose that a wireless menu response from the network device includes an identifier and a menu location associated with one of the electronic devices as discussed in the April 13th interview. As also discussed in the interview, it is this menu response that allows the hand held control device to control diverse electronic devices by accessing the menu of each electronic device at the indicated network location. Accordingly, the combination of Humplemann et al. and Roy et al. does not disclose each and every limitation of Claims 1, 16 and 31 as amended herein.

In addition, even assuming that the cited references to Humpleman et al. or Roy et al. include the above-noted features, or a separate reference is cited for these features, Applicant

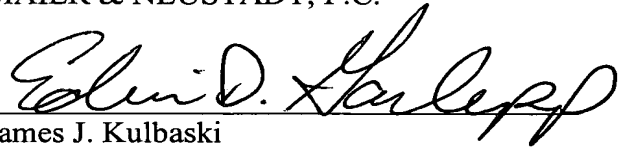
submits that there is simply no motivation to combine the features of Roy et al. with Humpleman et al. As discussed in the April 13th personal interview, the present invention was discovered based on recognition of the problems associated with a home network, such as the complexity and diversity among electronic devices on the home network. The present invention broadcasts a menu request from a hand held device to home LAN devices and displays a responding LAN device on the hand held device so that a user of the simple hand held control device can access and control the home LAN device. However, the broadcast and response feature of Roy et al. is in the context of a desktop computer hard wired to wide area network such as the Internet. Applicant submits that the broadcast and display features of the network environment of Roy et al. would not provide one of ordinary skill in the art with the motivation to modify the vastly different home network of Humpleman et al. That is, one of ordinary skill in the art would not implement a broadcast and display feature to a home network without Applicant's disclosure of the problems associated with home networks, which would be impermissible hindsight reasoning.

Finally, the cited reference to Hansen et al. is applied only for teachings of the dependent claims and, as discussed in the April 13th interview, does not correct the deficiencies of Humpleman et al. and Roy et al. Thus, Applicant's Claims 1, 16 and 31 patentably define over the cited references. Moreover, as the remaining pending claims depend from Claims 1, 16 or 31, these dependent claims also define over the cited references.

Consequently, in view of the present amendment, no further issues are believed to be outstanding in the present application, and the present application is believed to be in condition for formal Allowance. An early and favorable action is therefore respectfully requested.

Respectfully submitted,

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